STATE OF SOUTH CAROLINA South Carolina Electric & Gas Company Annual Update on Demand Side Management Programs and Petition for an Update to Rate Rider		ent Programs and	BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA COVER SHEET DOCKET NUMBER: 2011 E							
(Please type or print			CD N	(0.45)						
Submitted by:	K. Chad Burgess		C Bar Number:	803-217-8141						
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	220 Operation Wa Cayce, SC 29033		ax. Other:	003-217-7731						
	Cayce, SC 29033			gess@scana.com						
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January 31, 2011

VIA ELECTRONIC FILING

The Honorable Jocelyn G. Boyd Chief Clerk/Administrator **Public Service Commission of South Carolina** 101 Executive Center Drive (29210) Post Office Drawer 11649 Columbia, South Carolina 29211

RE: South Carolina Electric & Gas Company

Annual Update on Demand Side Management Programs and Petition for an

Update to Rate Rider

Docket No. 2011-___-E

Dear Ms. Boyd:

On behalf of South Carolina Electric & Gas Company ("SCE&G"), please find enclosed for filing one copy of SCE&G's Annual Update on Demand Side Management Programs and Petition for an Update to Rate Rider.

By copy of this letter, we are providing the South Carolina Office of Regulatory Staff with a copy of the enclosed document and enclose a certificate of service to that effect.

If you have any questions, please advise.

Very truly yours,

K. Chad Burgess

KCB/mcs Enclosure

cc:

John W. Flitter

Jeffrey M. Nelson, Esquire

(both via electronic mail and U.S. First Class Mail with enclosures)

BEFORE

THE PUBLIC SERVICE COMMISSION

OF

SOUTH CAROLINA

DOCKET NO. 2011-___--E

In the Matter of:)
South Carolina Electric & Gas Company Annual Update on Demand Side Management Programs and Petition for an Update to Rate Rider) SOUTH CAROLINA ELECTRIC &) GAS COMPANY'S ANNUAL UPDATE) ON DSM PROGRAMS AND PETITION FOR UPDATE TO DSM RATE RIDER

Pursuant to S.C. Code Ann. § 58-37-20 (1976, as amended) and Public Service Commission of South Carolina ("Commission") Regulation 26 S.C. Code Ann. Regs. 103-819, 103-825 (1976, as amended), and in compliance with Commission Order No. 2010-472 issued in Docket No. 2009-261-E, South Carolina Electric & Gas Company ("SCE&G" or "Company") hereby (i) submits to the Commission for review information concerning the current status of SCE&G's demand reduction and energy efficiency ("Demand Side Management" or "DSM") programs and (ii) petitions the Commission for authorization to update the annual rider approved in Docket No. 2009-261-E to provide for the recovery of SCE&G's costs and lost net margin revenue associated with its DSM programs along with the Commission-approved shared savings incentive for investing in such programs.

In support of this petition, SCE&G would respectfully show to the Commission:

1. This matter comes before the Commission pursuant to Commission Order No. 2010-472 and S.C. Code Ann. § 58-37-20 (1976, as amended). In Order No. 2010-472, the Commission approved SCE&G's suite of DSM programs and authorized the Company to

establish an annual DSM rate rider ("Rate Rider"). In accordance with S.C. Code Ann. § 58-37-20 and as described more fully below, the Rate Rider is designed to allow SCE&G to recover the costs and net lost revenue associated with its DSM programs along with a shared savings incentive equal to 6% of the net benefits derived from its DSM programs during the coming year.

- 2. In Order No. 2010-472, the Commission also ordered SCE&G to make an annual filing with this Commission updating its Rate Rider beginning in January 2011 and in each subsequent January through the life of the DSM programs.
- 3. In accordance with Order No. 2010-472, the annual filing must set forth the programs, net lost revenues, program costs, incentive, net program benefits, and other items as appropriate. Moreover, the annual filing must encompass the twelve-month period beginning December 1 and ending November 30. For this filing, the reporting period is December 1, 2010 to November 30, 2011 (the "Reporting Period").
- 4. In Order No. 2010-472, the Commission approved a suite of nine (9) DSM programs for development and implementation. Exhibit 1 sets out the most significant aspects of program development and implementation status for each of the approved programs as well as other pertinent information.¹
- 5. Exhibit 2 shows the regulatory asset account balance of allowable DSM program costs as of November 30, 2010; that amount is \$1,770,706. Pursuant to Order No. 2010-472, these costs are to be amortized over five years with unrecovered balances bearing carrying costs at the Company's weighted average cost of capital. Accordingly, SCE&G proposes that the Rate

¹ Exhibit 1 provides program information in ten (10) columns. For the purposes of tracking, the approved program "Residential Energy Check-up and Home Performance Audit" has been split into two separate columns.

Rider be set to allow the Company the opportunity to recover \$354,142 in program costs during the twelve-month period beginning with the first billing cycle of May 2011 and ending with the last billing cycle of April 2012 (the "Recovery Period").

- 6. Exhibit 3 shows the calculation of the appropriate amount of net lost revenues to be recovered during the Recovery Period; that amount is \$6,320,207. This amount reflects the forecasted level of customer participation in each DSM measure during the period December 2010 through November 2011 and the reduction in demand charges and MWH sales that are calculated to occur as a result. This amount will be recalculated and trued-up in the January 2012 annual filing.
- 7. As shown on Exhibit 4, the allowable shared savings incentive for the Reporting Period totals \$1,813,020. This amount is based upon estimated net program benefits through November 2011 and will be trued-up in the January 2012 annual filing. Pursuant to Order No. 2010-472, the shared savings incentive is to be amortized over five years without interest or carrying costs added to the calculation of the Rate Rider. Accordingly, SCE&G proposes that the Rate Rider be set to allow the Company the opportunity to recover a shared savings incentive totaling \$362,604 during the Recovery Period.
- 8. As indicated in Exhibit 1, only two DSM programs had been opened up to applications or participation by the close of the Reporting Period and those programs had only been in operation for a short time when the Reporting Period ended. For this reason, the Company has not had the opportunity to measure the impact of these programs on energy consumption and peak demand during the Reporting Period through its Evaluation Measurement & Verification ("EM&V") process. Since no EM&V results have been generated for the current

programs, the incentive calculation is based on estimated values of program amounts through November 2011 and will be trued-up in the next annual filing when EM&V results are available.

9. Exhibit 5 shows that the total amount to be recovered under the Rate Rider during the Recovery Period is \$7,036,953. It also reflects the calculation of the billing factors for each customer class based on that customer class' appropriate billing units. Based on those calculations the appropriate billing factors applicable to SCE&G's electric customers beginning with the first billing cycle of May 2011 would be, if approved, as follows:

Customer Class	\$/kWh
Residential	\$0.00044
Small General Service	\$0.00085
Medium General Service	\$0.00022
Large General Service	\$0.0008

- 10. Based on the foregoing, the Rate Rider for a residential customer will increase from \$0.00026 to \$0.00044 per kilowatt-hour. As a result, the Company estimates that the Rate Rider will cause the bill of an average residential customer using 1,000 kilowatt-hours per month to increase approximately \$0.18.
- 11. Exhibit 6 is the proposed updated Rate Rider to be implemented during the Recovery Period.
- 12. All calculations contained in the attached exhibits are in accordance with the formulas, methodologies, and rate designs approved by the Commission in Order No. 2010-472.
- 13. Information concerning the impact of DSM programs on energy consumption and peak demand on SCE&G's system during the Reporting Period will be included in subsequent filings as EM&V data becomes available.
- 14. Given the lack of available EM&V data at this time, there have been no adjustments to the Company's planning assumptions regarding DSM measure savings.

- 15. At present, SCE&G is proposing no new programs for the coming year and no programs are subject to termination.
- 16. As of January 31, 2011, SCE&G has had 362 industrial customers opt-out of its DSM programs, which represents approximately 70% of SCE&G's industrial load.
- 17. Based on the foregoing, SCE&G respectfully requests that the Commission approve the proposed update to the Company's DSM Rate Rider as described herein and in the attached exhibits. Additionally, the Company requests, in accordance with S.C. Code Ann. § 58-27-870(F), that the Commission allow the proposed updated Rate Rider to be put into effect without notice and hearing. The proposed updated Rate Rider does not require a determination of SCE&G's entire rate structure or its overall rate of return. Moreover, proceeding in this manner facilitates an orderly rate administration.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

K. Chad Burgess (

Matthew W. Gissendanner

South Carolina Electric & Gas Company

Mail Code C222 220 Operation Way Cayce, SC 29033

(803) 217-8141

chad.burgess@scana.com

matthew.gissendanner@scana.com

Belton T. Zeigler Lee E. Dixon

Pope Zeigler, LLC

P.O. Box 11509

Columbia, SC 29211

(803) 354-4949

bzeigler@popezeigler.com

ldixon@popezeigler.com

Attorneys for South Carolina Electric & Gas Company

January 31, 2011 Cayce, South Carolina

Demand Side Management - Program Updates - January 31, 2011

Commercial and Industrial - Custom	ncentives to non-residential customers for qualifying energy efficient projects that are not eligible for the Prescriptive Program. Customers will receive no more than \$25,000 in incentives per year for custom projects.	. 105 participants, 19,029 MWIn, 2.87MW	3/1/2011	Energy efficient projects not eligible for the Prescriptive Program will be evaluated on a project-by-project basis and a custom intensitie offered. Customers will receive incentives or may assign to contractor. In addition to field services support, ICF Resources will provide customer service and technical support for this program.	Hailbing program implementation desilis.	Finalize program offering, application and information on SCERG website.
Commercial and Industrial - Prescriptive	incentives to non-residential customers or the installation of high efficiency lighting. Ilighting controls, LED traffic signals, HVAC systems and food service equipment.	374 participants, 36,327 MWh, 3.47 MW reductions	10/1/2010	Customers will receive rebates (or may assign to contractor) for the Installation or heav high efficiency lighting, lighting controls, traffic signals, HVAC systems and various food service equipment. In addition to field services support, ICF Resources will provide customers will technical support for this technical support for this program.	Applications are available on the SCEAG website for Lighting. New Construction Lighting. ID Traffic Signals, Unitary HYAC, HYAC Variable Frequency Drives, and HYAC Chillers. To date, eleven applications have received pre-approval and over \$526,000 in incentives have been committed. First trade ally taining session held January 25, 2011.	Launch incentives for food service equipment. Continue contractor/trade ally outreach and training.
ENERGY STAR New Homes	ncentives provided to builders for homes built to ENERGY STAR standards.	Z50 new homes, 225 MWh, 0.08 MW reductions	4/1/2011	ICF Resources will recruit and train builders to participate in the program. The program incentives will be based on each home's HERS flating when considered in addition to field services support, ICF Resources will provide customer service and technical support for this program.	Finalising program implementation details.	Finalize program design and marketing elements. Recruit participating builders.
Existing HVAC Tune-Up	One-time incentives to encourage customers to improve the efficiency of existing Aca and heat pump systems through HAAC tuneups, duct installation and duct sealing.	6576 participants, 3755 MWH, 1.72 MW reductions	3/1/2011	Services will be delivered via independent contractors. Customers will submit rebate applications upon completion of installation. Customer service and technical support for this program will be provied by ICF Resources.	Finalizing program incentives, Finalizing rebate applications and other program implementation details. Evaluating more customer- centric program naming.	Finalize program design and marketing elements. Recruit contractors. Develop standards for tune- ups.
New HVAC and Water Heater	incentives to residential customers for pruchase of high efficiency IVAC and non-efficiency IVAC and incomplete the series of the water heaters frow construction or replecement installations).	5399 participants, 7007 MWH, 1.65 MW reductions	3/1/2011	Customers will receive rebates (or may safety to participating contractors) for the installation of new high efficiency HVAC systems or work-electric states as service and technical support for this program will be provided by ICF Resources.	Finalizing equipment incentives. Finalizing reacts applications and other program implementation details. Evaluating more customer centric program naming.	Finitize program design and marketing elements. Recruit contractors:
ENERGY STAR Lighting and Appliance	incentives for the purchase of ENERGY STARY qualified lighting and lighting products.	113,434 partiicipants, 24,373 MWH, 3.15 MW reductions	2/14/2011	Qualified ENERGY STAR lighting and lighting fixtures will be discounted at point of purchase for customers. SCEEG will pay participating retailers for discounts provided. ICF Resources and lighting program implementer, APT, will provided customer service technical and field services support for this program.	Finalising agreements with initial participating retailers. Finalising point-of-purchase signage for placement in participating stores. Hring field staff to educate and recruit additional retailers and monitor in-store promotions. Evaluating more customer-centric program naming.	Recruit and train additional retailers.
Home Performance Audit	Comprehensive audit with diagnostic testing of a customer's home by trained contractors with incentives offered for installation of recommended measures.	683 customers, 1758 MWh, 0.38 MW reductions	3/1/2011	Third party implementer, ICF Recources, will recruit and train jordic contractors on program protection. Customs will incur the cost of the initial audit with SCESG offering relates for the installation of custome revoir can the technical support for this program will be provided by ICF Resources.	Finalizing program implementation details. Poluating more customer centric program naming.	Develop web content and various materials for program raticipants. Finalize other marketing elements.
Home Energy Check-up Home P	Free in-home visual energy assessment performed by SCE&G staff with leave-behind energy efficiency efficiency efficiency and appear that wap and pipe insulation, as appropriate.	1367 customers, 492 MWh, 0.10 MW reductions	10/1/2010	in-home energy assessments are provided by SCE&G's Energy information Services department, which also handles customer scheduling. Customer service support is provided by the SCE&G Contact Center.	Nearly 400 Check-ups have been performed since the program's faunch on October 1, 2010.	Leverage opportunities to promote other DSM programs through Home Energy Check- up, as appropriate.
Energy Information Display	Discounted energy information display (injormation display (injormation are constituted as a waveness of energy consumption in their homes, thus, divining more energy conscious decision making.	4156 participants, 1662 MWH, 0.27 MW reductions	Second quarter 2011	Customers will receive an EID device for a change of \$40 and a \$20 creati conce device activation is confirmed, Low-Income customers will receive the device as no change. SCERG will administer this program in-house with its finergivities contact canter group providing customer group providing customer service support.	Targeted Phase 1 program- implementation currently underway. Agtech in-home display devices misle to 248 SCANA Voice of the Customer paneltst forsidential customers) and 44 small customers) and 44 small customers) and 44 small complete three of commercial customers with smallarly, complete three surveys over a 50 day period. Commercial customers will smillarly, complete three surveys over a 54 month	incorporate findings from Phase 1 implementation in roll out of program to larger customer base.
Usage Benchmarking	Free monthly/bi-monthly reports comparing customer's energy usage to peer group and producing information to help identify, analyze, and at upon potential energy efficiency measures and behaviors.	25,000 participants, 8250 MWH, 3.02 MW reductions	4/1/2011	250,000 customers will be solicited to opt-in to the Direct, Oprogram. Direct, Oprogram. Direct, Oprogram. SCE&G's EnergyWise Contact Center group will provide customer service support for this program.	Finalibing initial survey through which customers will opt-in to the program. Finalibing format for into customer Home Energy Report and content library for future benchmarking reports. Evaluating more customer centric program naming.	Establish URL for program website and develop web content.
	General Overview	Year 1 Program Forecast	Launch Date	Implementation Approach	Current Status:	Next Steps

SCE&G

Amortization of Program Costs for DSM Rate Calculation

Actual Balance of Program Costs @ 11/30/2010 \$ 1,770,706

Customer Class	Allocation Ratios ¹	Class Allocation of Balance			e Year Amortization or Rate Calculation
RES	66.70%	\$	1,181,060	\$	236,212
SGS	20.38%	\$	360,870	\$	72,174
MGS	6.46%	\$	114,388	\$	22,878
LGS	<u>6.46</u> %	<u>\$</u>	114,388	\$	22,878
TOTAL	100.00%	\$	1,770,706	\$	354,142

¹ Determined from <u>projected</u> program-specific costs through November 2011. Subsequent periods will directly assign costs to customer classes responsible for their causation and allocate indirect costs to customer classes based on the directly assignable cost ratios from the Reporting Period.

SCE&G

Projection of Net Lost Revenues for DSM Rate Calculation
From December 2010 - November 2011

	Program-Related			
Customer	Energy Savings (in	Net Lost Revenue		
Class	KWH)	Factors (\$ per KWH)	Net	Lost Revenues
RES	35,764,000	\$0.08704	\$	3,112,899
SGS	36,327,000	\$0.06762	\$	2,456,432
MGS	7,929,000	\$0.05872	\$	465,591
LGS	7,929,000	\$0.03598	<u>\$</u>	285,285
		Total:	\$	6,320,207

SCE&G

Projection of Shared Savings Incentive
for DSM Rate Calculation
For December 2010 - November 2011

Customer Class	E	stimated Net Benefits	6%	6 Shared Savings Incentive	Am	One Year ortization for Rate Calculation
RES	\$	11,757,410	\$	705,445	\$	141,089
SGS	\$	11,442,710	\$	686,563	\$	137,313
MGS	\$	3,508,426	\$	210,506	\$	42,101
LGS	\$	3,508,426	\$	210,506	\$	42,101
		Totals:	\$	1,813,020	\$	362,604

SCE&G DSM Rate Calculation (Effective for the Recovery Period of May 2011 - April 2012)

			Customer Class							
Exhibit					S	mall General	Me	edium General	Į	arge General
No.	Description	 Total		Residential		Service		Service		Service
2	Amortization of Program Costs	\$ 354,142	\$	236,212	\$	72,174	\$	22,878	\$	22,878
3	Estimated Net Lost Revenues	\$ 6,320,207	\$	3,112,899	\$	2,456,432	\$	465,591	\$	285,285
4	Shared Savings Incentive	\$ 362,604	<u>\$</u>	141,089	<u>\$</u>	137,313	\$	42,101	<u>\$</u>	42,101
	Total DSM Costs for Recovery	\$ 7,036,953	\$	3,490,200	\$	2,665,919	\$	530,570	\$	350,264
	Projected Class Sales (in GWH) during the Recovery Period ¹			7,958.6		3,131.8		2,404.2		4,324.0
	Rate per KWH		\$	0.00044	\$	0.00085	\$:	0.00022	\$	0.00008

¹ Projected Class Sales are for the Recovery Period of May 2011 - April 2012 and are adjusted to account for those customers who have opted-out of SCE&G's DSM programs.

RIDER TO RETAIL RATES

DEMAND SIDE MANAGEMENT COMPONENT

(Page 1 of 2)

APPLICABILITY

Service supplied under the Company's retail electric rate schedules is subject to approved Demand Side Management (DSM) program cost adjustments. The rates shown below are applicable to and a part of the Company's South Carolina retail electric rate schedules and included in the monthly rate provision of the applicable schedule used in billing and shall therefore be added to customer's monthly bill statement:

DSM RATES BY CLASS (\$/kWh)

Customer Class	DSM Factors
Residential	0.00044
Small General Service	0.00085
Medium General Service	0.00022
Large General Service	0.00008

DERIVATION OF FACTORS

Demand Side Management costs to be recovered in an amount rounded to the nearest one-thousandth of a cent per kilowatt-hour, will be determined by the following formula:

A = D/S

- A = Customer Class Specific DSM Program Costs Rate Adjustment per kilowatt-hour applied to base rates rounded to the nearest one-thousandth of a cent.
- D = DSM revenue requirement for the period calculated as (C + L + R)

Where

- C = One year of Amortization Expense (based upon the balance of DSM Program Costs at the beginning of the annual review period) plus associated Carrying Costs (calculated using the Company's Weighted Average Cost of Capital)
- L = Net Lost Revenues for each customer class based on forecasted retail kWh sales reductions attributable to DSM programs. Revenue lost is calculated using the average rate per customer class less the class specific fuel component and variable O&M. The resulting factor is then multiplied by the kWh sales lost for each class of customers. This amount will be "trued-up" for the actual impact on prior year sales.
- R = One year of amortization of DSM Program Incentive to be calculated by multiplying the estimated Net Present Value Benefit of each energy efficiency program as determined by the Utility Cost Test times 6%.
- S = Projected customer class specific sales, defined as retail kilowatt-hour sales from each class of customers for the current period, less sales from customers who have been approved for opt-out status.

The appropriate revenue-related tax factor is to be included in these calculations.

"OPT-OUT" PROVISION

- 1. Industrial customers as defined in Rate 23 are eligible to opt-out of DSM programs and costs.
- Customers wishing to opt-out of DSM programs and recovery of DSM costs shall file a writing with the Company on a form provided by the Company representing that they have already implemented or will be implementing alternative DSM programs. Certifications shall be valid until withdrawn. If a Customer should choose to participate in one or more DSM programs for any account, then such Customer will not be permitted to opt-out of DSM programs and recovery of DSM costs for that account for a period of five years.

RIDER TO RETAIL RATES

DEMAND SIDE MANAGEMENT COMPONENT

(Page 2 of 2)

3. Customers who opt-out but later elect to participate in one of the Company's programs may do so upon application to the Company. If acceptable to the Company, the Customer may participate in the Company's programs, but may not apply to opt-out again for a period at least as long as the amortization period.

Since DSM charges are included and a part of retail rates, customers qualifying for the opt-out provision shall receive the following DSM Credit on their monthly bill statement:

DSM Credit = Billed kWh times the applicable DSM Rate*

* The DSM Rate shall be as shown in the above table for the schedule applicable to Customer's monthly bill.

DEFINITIONS

- 1. Annual Review Period The period of time between December 1 and November 30.
- 2. Amortization Period The five-year period of time which the Company's DSM measures, program costs and incentive are deferred and amortized.
- 3. Customer Class The Company's classification of customers based on similar energy usage characteristics. These are defined as follows:

Residential:

Rate 1 – Good Cents Rate, Rate 2 – Low Use Residential Service, Rate 5 - Residential Service Time-of-Use, Rate 6 – Energy Saver / Conservation Rate, Rate 7 – Residential Service Time-Of-Use Demand, Rate 8 – Residential Service

Small General Service:

Rate 3 – Municipal Power Service, Rate 9 – General Service, Rate 10 – Small Construction Service, Rate 11 – Irrigation Service, Rate 12 – Church Service, Rate 13 – Municipal Lighting Service, Rate 14 – Farm Service, Rate 16 – General Service Time-Of-Use, Rate 22 – School Service, Rate 28 (Experimental) – Small General Service Time-Of-Use Demand

Medium General Service:

Rate 19 – General Service Concurrent Demand Time-Of-Use, Rate 20 – Medium General Service, Rate 21 – General Service Time-Of-Use Demand, Rate 21A – Experimental Program - General Service Time-Of-Use Demand

Large General Service:

Rate 23 – Industrial Power Service, Rate 24 – Large General Service Time-Of-Use, Rate 27 - Large Power Service Real Time Pricing (Experimental)

SALES AND FRANCHISE TAX

To the above will be added any applicable sales tax, franchise fee or business license tax which may be assessed by any state or local governmental body.

PAYMENT TERMS

All bills are net and payable when rendered.

TERM OF CONTRACT

The contract terms will be the same as those incorporated in the rate tariff under which customer receives electric service.

GENERAL TERMS AND CONDITIONS

The Company's General Terms and Conditions are incorporated by reference and form a part of this rider.

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2011 - ____ - E

IN RE:		
South Carolina Electric & Gas Company Annual Update on Demand Side Management Programs and Petition for an Update to Rate Rider)))	CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day one (1) copy of South Carolina Electric & Gas Company's Annual Update on Demand Side Management Programs and Petition for an Update to Rate Rider to the following person in the manner and at the address set forth below:

Via Electronic Mail and U.S. First Class Mail

John W. Flitter
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
iflitter@regstaff.sc.gov

Jeffrey M. Nelson, Esquire Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201 jnelson@regstaff.sc.gov

Mary C. Salarie

Cayce, South Carolina This 31st day of January, 2011